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FEC MAIL CENTER

Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: Ronald Simmons Campaign

June 25, 2012

Attn.: Daniel Buckley

Dear Sir:

In regards to your letter of June 4, 2012, a copy of which is enclosed, we are NOT a "political Committee" covered by 2 U.S.C. 431 (4).

The treasurer of the Denton County Republican Victory Fund mistakenly reported our contribution on his April quarterly FEC report. Per 11 CFR 103.3 (b) (1), he has refunded the full amount that we paid to them. A copy of that refund check is attached.

We have instructed the Denton County Republican Party that all future contributions from us should be deposited into the non-federal account and that our contribution should not be used to influence any election for federal office.

Sincerely,



Campaign Treasurer

LISA SIMMONS

12030831482

12030831483

88-8072-3119

8141

**DENTON COUNTY REPUBLICAN  
VICTORY FUND**  
1400 N CORINTH ST. STE 106  
CORINTH, TX 76208

June 21, 2012

Pay To  
The Order Of Ronald Symon & Company \$ 2525.00

Two thousand five hundred twenty five & 00/100

**DATCU**  
(866) 387-8585  
WWW.DATCU.ORG

For Refund Check Randy Ogden MP

SAFETY CHECK

Security Features  
Included  
Details on Back.

**SCHEDULE A (FEC Form 3X)****ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 66 OF 97

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
			<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

**DENTON COUNTY REPUBLICAN VICTORY FUND**

Full Name (Last, First, Middle Initial)

**A. Parker Campaign**

Mailing Address PO Box 271741

City	State	Zip Code
Flower Mound	TX	75027

FEC ID number of contributing  
federal political committee.**C**

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

1250.00

Date of Receipt

MM / DD / YYYY  
03 / 15 / 2012

Transaction ID : SA11C.7444

Amount of Each Receipt this Period

1250.00

Full Name (Last, First, Middle Initial)

**B. Ronald Simmons Campaign**

Mailing Address 805 Lady of the Lake

City	State	Zip Code
Lewisville	TX	75056

FEC ID number of contributing  
federal political committee.**C**

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

2500.00

Date of Receipt

MM / DD / YYYY  
01 / 09 / 2012

Transaction ID : SA11C.7453

Amount of Each Receipt this Period

2500.00

Full Name (Last, First, Middle Initial)

**C. Ronald Simmons Campaign**

Mailing Address 805 Lady of the Lake

City	State	Zip Code
Lewisville	TX	75056

FEC ID number of contributing  
federal political committee.**C**

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

2525.00

Date of Receipt

MM / DD / YYYY  
03 / 19 / 2012

Transaction ID : SA11C.7454

Amount of Each Receipt this Period

25.00

SUBTOTAL of Receipts This Page (optional).....▶

3775.00

TOTAL This Period (last page this line number only).....▶

12030831484

**Donna García Davidson**  
**ATTORNEY AND COUNSELOR AT LAW**  
**P.O. BOX 12131**  
**AUSTIN, TEXAS 78711**

**Telephone: 512.775.7625**  
**Toll Free Fax: 877.200.6001**

**E-mail: donna@dgdllawfirm.com**  
**Website: www.dgdllawfirm.com**

**June 19, 2012**

**Via Email: partyadmin@dentongop.org and CMRRR #7011 0470 0001 0149 3046**

**Ms. Dianne Edmondson**  
**Denton County GOP Chairman**  
**Denton County Republican Party**  
**1400 N. Corinth St., Suite 106**  
**Corinth, Texas 76208**

**Re: Ron Simmons, Candidate for State Representative, District 65**

**Dear Ms. Edmondson:**

On behalf of Ron Simmons, I need to make a request of you in light of some correspondence my client received from the Federal Election Commission (FEC) (enclosed). The FEC has written to us regarding a payment made to the Denton County Republican Party for my client and his guests to attend the Lincoln-Rengas Day dinner. The check for this event was written to the "Denton GOP," a copy of which is also enclosed.

According to the FEC reports, Mr. Simmons' campaign is shown making contributions of \$2500 and \$25 to the Denton County Republican Party Victory Fund which would then potentially require his local, state representative campaign to file as a political committee. Since we do not believe he has to do so, in accordance with the directions provided by the FEC, we request that the funds be transferred to a non-federal account.

Thank you in advance for your assistance in this matter and please do not hesitate to contact me if you have any questions or need further information.

Sincerely,

  
Donna García Davidson

DGD/dr  
Enclosures  
cc: Ron Simmons

12030831485

**Donna García Davidson**  
**ATTORNEY AND COUNSELOR AT LAW**  
**P.O. BOX 12131**  
**AUSTIN, TEXAS 78711**

Telephone: 512.775.7625  
Toll Free Fax: 877.200.6001

E-mail: donna@dgdlawfirm.com  
Website: www.dgdlawfirm.com

June 19, 2012

**Via Certified Mail Return Receipt Requested #7011 0470 0001 0149 3039**

Mr. Daniel Buckley  
Senior Campaign Finance Analyst  
Federal Election Commission  
Washington, DC 20463

**Re: Ron Simmons, Candidate for State Representative District 65**


Dear Mr. Buckley:

On behalf of Ron Simmons, this letter is to respond to your correspondence to my client dated June 4, 2012, with a response due date of July 9, 2012 (enclosed). Pursuant to your correspondence as well as my follow up conversation with an analyst<sup>1</sup> in your office, my client made a written request to the Denton County Republican Party.

In that request, in accordance with the directions provided by your letter, we asked that the funds reflected as contributions of \$2500 and \$25 from my client's campaign account be transferred to a non-federal account. A copy of the written request is enclosed. For your information, we have also enclosed a copy of the check as written which was to the "Denton GOP" with no indication that it was intended as a contribution that may be used for federal candidates. In fact, the \$2500 contribution was to pay for my client and his guests to attend a Lincoln-Reagan Day banquet and he had no intention of making a contribution to federal candidates with that money.

Thank you in advance for your assistance in this matter and please do not hesitate to contact me if you have any questions or need further information.

Sincerely,

  
Donna García Davidson

DGD/dr  
Enclosures  
cc: Ron Simmons

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<sup>1</sup> On Monday, June 11, 2012, I spoke to David in your office and discussed this matter more fully.

12030831486



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-U

June 4, 2012

RONALD SIMMONS CAMPAIGN  
805 LADY OF THE LAKE  
LEWISVILLE, TX 75056

Dear Treasurer:

**Response Due Date**

**07/09/2012**

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

- The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year. (2 U.S.C. §431(4) and 11 CFR § 100.5)

A review of the receipts reported by the "DENTON COUNTY REPUBLICAN VICTORY FUND" indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 2012 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. (2 U.S.C. §431(9)). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (Copies of FEC FORMs 1 and 3X can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413); or

2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

12030831487

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

**Please notify the Commission by the response due date noted above of your decision on this matter.** If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1141.

Sincerely,



Daniel Buckley  
Senior Campaign Finance Analyst  
Reports Analysis Division

12030831488

front only)

12030831489

E SIMMONS  
PAGE FUND  
LEWISVILLE, TX 75056-6720

1002  
2-001110  
01

1-6-12 Date

Pay to the Order of Denton GDA \$ 2500.00

Two thousand five hundred & no/100

NORTH DALLAS BANK & TRUST CO.

For Sir Ken - Liscato Dena Ron Swann

FDIC



Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 7/2/12
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Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

ED  
PREPARER  
(3/2005)

7/9/12  
DATE PREPARED

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